

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

[REDACTED],
Plaintiff,

v.

[REDACTED], et al.,
Defendants.

Case No. 20-cv-02617

Judge Edmond E. Chang

Magistrate Judge Jeffrey Cole

**MEMORANDUM IN SUPPORT OF PLAINTIFF'S *EX PARTE*
MOTION TO EXTEND THE TEMPORARY RESTRAINING ORDER**

Pursuant to Rule 65(b)(2) of the Federal Rules of Civil Procedure and the Court's inherent power to effectuate its own orders, Plaintiff seeks to extend the Temporary Restraining Order granted and entered by the Court on May 15, 2020 (the "TRO") [30] for a period of fourteen (14) days until June 12, 2020.

On May 15, 2020, this Court entered the TRO against the Defendants identified on Schedule A to the Amended Complaint. [30]. As of May 26, 2020, the third parties have not completed effectuating the TRO. Declaration of Justin R. Gaudio at ¶ 2. Plaintiff plans to freeze financial accounts identified by the third parties. *Id.*

Rule 65(b)(2) states that a temporary restraining order entered without notice may be extended provided a party can show, prior to expiration of the order, good cause for such an extension. Fed. R. Civ. P. 65(b)(2). Plaintiff respectfully submits that there is good cause to extend the TRO, since there is a high probability that the Defendants will continue to harm Plaintiff without the TRO in place. Specifically, Defendants will likely attempt to move any assets from their financial accounts to off-shore bank accounts. As discussed in Plaintiff's Memorandum in Support of its *Ex Parte* Motion for Entry of a Temporary Restraining Order,

and as found by the Court in granting the TRO, this possibility of harm is significant. Accordingly, in the interest of justice, Plaintiff submits that extension of the TRO is necessary. In light of the above, Plaintiff respectfully requests that the TRO be extended for a period of fourteen (14) days until June 12, 2020.

Dated this 26th day of May 2020.

Respectfully submitted,

/s/ Justin R. Gaudio
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